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Filing date: **01/16/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91220095
Party	Defendant TBC Trademarks, LLC
Correspondence Address	ROGER H. BORA THOMPSON HINE LLP 10050 INNOVATION DR STE 400 DAYTON, OH 45342  trademarks@thompsonhine.com
Submission	Answer
Filer's Name	Roger H. Bora
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Signature	/rhb/
Date	01/16/2015
Attachments	Answer to Opposition No 91220095 OREGONIAN.pdf(244623 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Trademark Application Serial No. 86/265,975

Mark: OREGONIAN

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Blount, Inc.	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91220095
	)	
TBC Trademarks, LLC	)	
	)	
Applicant.	)	
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**ANSWER TO NOTICE OF OPPOSITION**

TBC Trademarks, LLC. (“Applicant”), by and through its attorneys, answers the Notice of Opposition filed by Blount, Inc. (“Opposer”) as follows:

1. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 1 of the Notice of Opposition and accordingly denies same.
2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Notice of Opposition and accordingly denies same.
3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of the Notice of Opposition and accordingly denies same.

4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of the Notice of Opposition and accordingly denies same.

5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 of the Notice of Opposition and accordingly denies same.

6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 of the Notice of Opposition and accordingly denies same.

7. Applicant admits the allegations of Paragraph 7 to the extent that its pending U.S. trademark application for the mark OREGONIAN, Serial No. 86/265,975, covers tires, excluding tires for outdoor power equipment. As to the remaining allegations contained in Paragraph 7, Applicant is without knowledge or information sufficient to form a belief as to the truth of those allegations and accordingly denies same.

8. Paragraph 8 of the Notice of Opposition sets forth a legal conclusion to which a response is not required; to the extent Opposer intended to elicit a response, Applicant denies Paragraph 8.

9. Applicant admits the allegation in Paragraph 9 to the extent that Applicant did not seek authorization from Opposer to adopt or register the mark OREGONIAN and affirmatively asserts no such authorization was necessary; Applicant otherwise denies the allegations of Paragraph 9 of the Notice of Opposition.

10. Applicant denies the allegations of Paragraph 10.

11. Applicant denies the allegations of Paragraph 11.

12. Applicant denies the allegations of Paragraph 12.

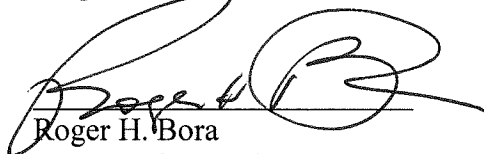
AFFIRMATIVE DEFENSE

13. There is no likelihood of confusion between Opposer's mark and Applicant's mark.

WHEREFORE, Applicant prays that the Opposition be dismissed and that its Application Serial No. 86/265,975, be allowed and its subject trademark be allowed to register.

January 16, 2015

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Roger H. Bora", is written over a horizontal line.

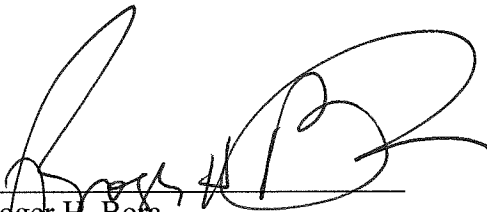
Roger H. Bora  
Attorney for Applicant  
Thompson Hine LLP  
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Dayton, Ohio 45342  
(937) 443-6817

CERTIFICATE OF SERVICE

This is to certify that I have this day served all counsel of record with the foregoing ANSWER TO NOTICE OF OPPOSITION by depositing a copy of the same in the United States mail, postage prepaid and properly addressed as follows:

Thomas L. Holt  
Steptoe & Johnson LLP  
1330 CONNECTICUT AVE NW  
Washington, DC 20036

This 16th day of January 2015.



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